

August 25, 2010

via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036
June Monthly Report (5/1/10 ? 5/31/10)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated July 21, 2010. I will address each of the items in your letter in turn:

1) The contributions in question did not exceed the allowable limits, but appeared to do so because of clerical errors in how they were reported. In October 2009, two contributions were made to the same candidate, one to the 2010 Primary and the other to the 2009 Special General Election held on 11/3/09. The later contribution, however, was incorrectly shown as applying to the 2010 General election; that report has been amended to correct that error. In May, 2010, a contribution was made to the 2010 General Election, but that too was incorrectly reported, as applying to the 2010 Primary. That report has also been amended to reflect the correct election. With the amended reports, it should now be clear that there were three contributions, each to a different election, and that none exceeded the relevant limit.

2). Your letter noted that the estimated amounts and dates for an IE disclosed on 48 hour notices with ""The New Media Fund, Inc"" listed as the payee did not appear to correlate with the entries on Schedule E of the Monthly Report disclosing the actual payments to The New Media Firm, Inc. We think the confusion may be caused by the fact that the 24 hour notice was filed on the last day of the preceding month, while the cash disbursements for the IE were made in two parts; one in the May monthly reporting period and the other in the June monthly reporting period. (note: your letter mentioned ""48 hour notices"" but appears to reference a 24 hour notice filed on 4/30/10). The 24 hour notice filed on 4/30/10 disclosed an estimated \$100,000 for internet ads. The May Monthly Report included a \$40,000 cash disbursement on 4/21/10 that was described as ""internet ads start 4/29; part of 4/30 24hr notice"". The June Monthly Report included a \$60,000 disbursement dated 5/11/10 that was described as ""internet ads reported on 4/30 24hr notice"". Together, these two disbursements paid for the estimated cost as disclosed on the 4/30/10 24 hour notice. We believe this should clarify the question you raised.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Associate General Counsel
Counsel for Government Affairs

cc: Gerald Hudson, Treasurer, SEIU COPE
